

PUBLIC DISCLOSURE

June 19, 2001

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

ALDENVILLE CREDIT UNION

**710 GRATTAN STREET
CHICOPEE, MA 01020**

**DIVISION OF BANKS
ONE SOUTH STATION
BOSTON, MA 02110**

<p>NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this financial institution.</p>
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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires the Division of Banks (Division) to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the needs of its entire assessment area, including low and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the Division must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **ALDENVILLE CREDIT UNION** prepared by the Massachusetts Division of Banks, the institution's supervisory agency.

INSTITUTION'S CRA RATING: This institution is rated "Satisfactory"

Aldenville Credit Union's overall CRA rating is based upon its performance under the five criteria contained herein. The following is a summarization of the findings that were considered in formulating the bank's overall CRA rating.

- Distribution of Credit Among Borrowers of Different Income Levels

A significant percentage of HMDA-reportable loans were made to individuals of low and moderate-income, given the demographics of the credit union's assessment area. In addition, the credit union's distribution of consumer loans to low and moderate-income borrowers, based upon a sample of loans, was considered to be very strong.

- Geographic Distribution of Loans

The credit union has achieved a reasonable penetration of HMDA-reportable loans and consumer loans in low and moderate-income census tracts in its assessment area.

- Comparison Of Credit Extended Inside And Outside Of The Assessment Area

Virtually all of the credit union's HMDA-reportable loans and consumer loans were originated within its assessment area.

- Loan to Deposit Analysis

The credit union has demonstrated a reasonable net loan to total deposit (share) ratio over the eight quarter periods reviewed.

- Review of Complaints/Fair Lending Policies and Practices

Aldenville Credit Union's Fair Lending policies and practices are considered reasonable. No weight was given to a review of complaints, as none has been received since the prior examination.

PERFORMANCE CONTEXT

Description of Institution

Aldenville Credit Union is a community- based financial institution incorporated in 1939. Its main office is located in the Aldenville section of Chicopee, Mass. In June 2000, Aldenville Credit Union opened its first full service branch office at the White Birch Plaza on Burnett Road in Chicopee. Both the main office and the branch office offer 24-Hour ATM service with network access. Aldenville Credit Union is a member of the SUM network of financial institutions

As of the March 31, 2001 NCUA 5300 Quarterly Report, Aldenville Credit Union had total assets of \$78,868,000. Of these total assets, \$45,855,000 or 58.1 percent were in the form of loans (gross).

The following table depicts Aldenville Credit Union's loan portfolio composition based on the March 2001 NCUA 5300 Report.

Loan Portfolio March 31, 2001	
Type of Loans	% of Total Loans
Real Estate Lending	
• First Mortgages/Lines of Credit	49.0
• All Other Real Estate/Lines of Credit	16.6
Consumer Lending	
• Unsecured Credit Cards/Lines of Credit	4.6
• All Other Unsecured Loans/Lines of Credit	4.1
• New Vehicle	8.0
• Used Vehicle	12.0
• All Other Loans	5.7
Total	100.0

Source: NCUA 5300 Report, 03/31/01.

First mortgage loans and lines of credit represent the largest segment (49.0 percent) of the credit union's loan portfolio. The second largest segment of the loan portfolio was consumer loan products, which represents 34.4 percent of the portfolio.

There appears to be no legal or regulatory impediment that would effect the credit union's ability to meet the credit needs of its community. The Division of Banks conducted the previous Community Reinvestment Act (CRA) evaluation as of July 12, 1999. That examination resulted in a "Satisfactory" rating.

Description of Assessment Area

The following table reflects Aldenville Credit Union's assessment area. Also included in the table are the HUD estimated Median Family Incomes for years 1999, 2000, and 2001 for the Springfield, Worcester, and non-Metropolitan Statistical Areas (MSA).

Assessment Area *		
Springfield MSA		
Franklin County	Hampden County	Hampshire County
Sunderland, Whately	Agawam, Blandford, Bondsville, Chester, Chicopee, East Longmeadow, Granville, Hampden, Holyoke, Longmeadow, Ludlow, Monson, Montgomery, Palmer, Russell, Southwick, Springfield, Three Rivers, Tolland, West Springfield, Westfield, Wilbraham	Amherst, Belchertown, Chesterfield, Easthampton, Granby, Goshen, Hadley, Hatfield, Huntington, North Amherst, Northampton, South Amherst, South Hadley, Southampton, Ware, Westhampton, Williamsburg
Median Family Income – Springfield MSA		
1999	2000	2001
\$46,400	\$47,500	\$49,700
Non-MSA		
Hampshire County		
Cummington, Middlefield, Pelham, Plainfield, Worthington		
Median Family Income – Non MSA		
1999	2000	2001
\$46,400	\$48,000	\$50,500
Worcester MSA		
Hampden County		
Brimfield, Holland, Wales		
Median Family Income – Worcester MSA		
1999	2000	2001
\$52,600	\$54,400	\$57,000

*Source: PCI Services, Inc., CRA Wiz Software.

Aldenville Credit Union's assessment area contains 123 census tracts. Of those tracts, 13 or 10.6 percent are low-income, 14 or 11.4 percent are moderate-income, 66 or 53.7 percent are middle-income and 24 or 19.5 percent are upper-income. In addition, there are 6 census tracts (4.8 percent) with no income designation. The following table reflects selected housing characteristics, based upon 1990 census data, for each of the census tract income groupings in Aldenville Credit Union's assessment area.

<i>Selected Housing Characteristics by Income Category of the Geography</i>							
<i>Geographic Income Category</i>	<i>Percentage</i>						<i>Median Home Value (\$)</i>
	<i>Census Tracts</i>	<i>Households</i>	<i>Housing Units</i>	<i>Owner-Occupied</i>	<i>Rental Units</i>	<i>Vacant Units</i>	
<i>Low</i>	10.6	7.9	8.1	1.5	17.8	8.4	87,708
<i>Moderate</i>	11.4	10.7	10.8	6.1	18.1	6.7	97,163
<i>Middle</i>	53.7	63.0	63.1	66.9	56.7	5.8	120,281
<i>Upper</i>	19.5	18.4	18.0	25.5	7.4	3.4	160,874
<i>NA</i>	4.8	0.0	0.0	0.0	0.0	0.0	0
<i>Total or Median</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>5.7</i>	<i>122,487</i>

Source: U.S. Census

The low-income census tracts are located in Springfield (8), Holyoke (4), and Amherst (1). The census tracts having no income designation (NA) are located in Springfield (1), Chicopee (1), Amherst (1), and Northampton (3).

Description of Aggregate Data Utilized/Lending Activity

Aggregate data for HMDA reportable lending performance purposes only constitutes 361 institutions including mortgage companies, savings banks, commercial banks, cooperative banks, and credit unions, which have originated and/or purchased residential mortgage and/or home improvement loans within the credit union's assessment area (source: PCI Services, Inc., CRA Wiz). The total number of originations/purchases received by these lenders in calendar year 1999 was 19,433. Aldenville Credit Union ranked 36th with 133 loans, or a 1.0 percent market share.

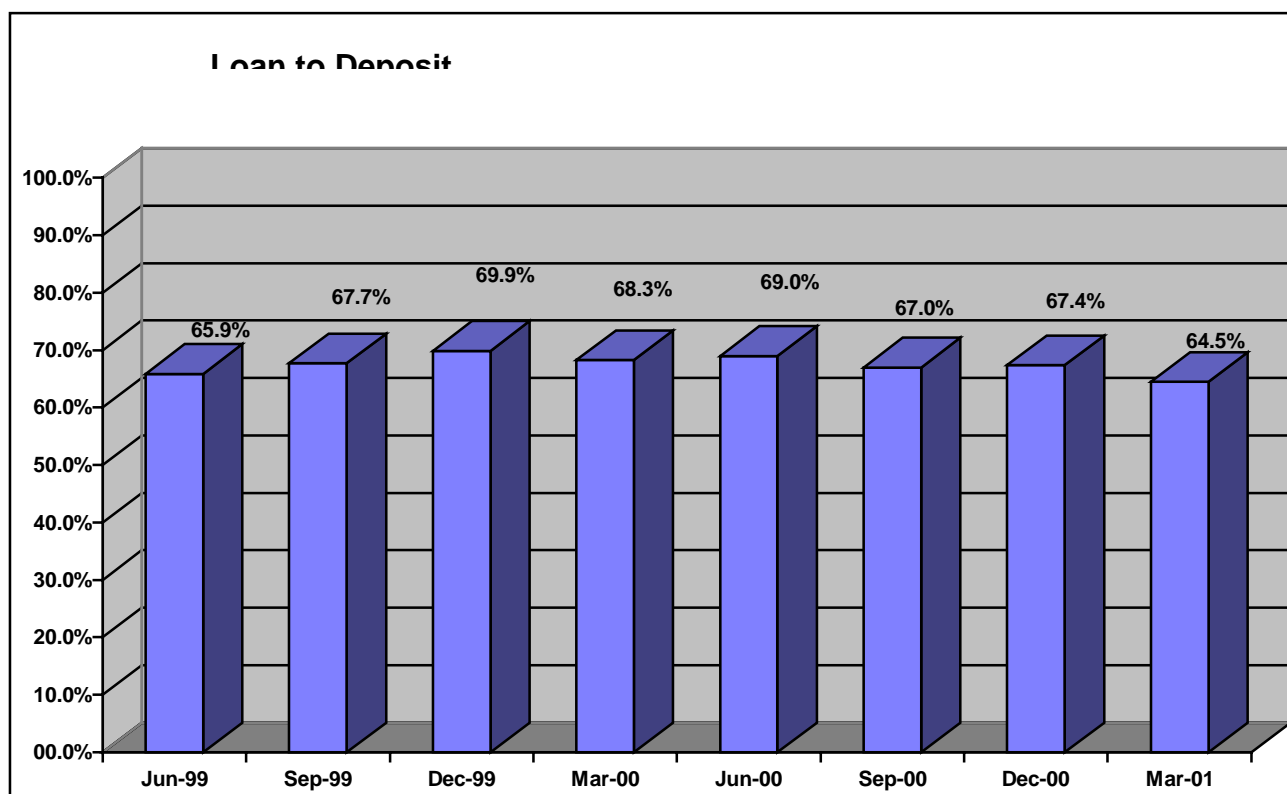
PERFORMANCE CRITERIA

1. LOAN TO DEPOSIT ANALYSIS

Based upon the following, Aldenville Credit Union's average net loan to deposit ratio appears to be reasonable and meets the standards for satisfactory performance.

An analysis of Aldenville Credit Union's average loan to deposit (share) ratio was performed. The calculation incorporated eight quarters of the credit union's net loans to total deposit (share) figures as reflected in the credit union's quarterly NCUA 5300 Reports. The quarters reviewed included the periods from June 1999 through March 2001. The credit union's average loan to deposit (share) ratio was 67.5 percent. This ratio has fluctuated from a low of 64.5 percent in March 2001, to a high of 69.9 percent in December 1999.

The following graph illustrates Aldenville Credit Union's net loan to total deposit trends.



Not reflected in the aforementioned analysis is the overall growth rate in net loans and total share deposits. Over the period depicted in the graph, Aldenville Credit Union's loan portfolio increased by 8.0 percent, while deposits grew by 10.4 percent. From March 31,

2000 through March 31, 2001, the credit union's loan portfolio increased by 4.4 percent, while deposits grew by 10.5 percent.

Aldenville Credit Union's loan to deposit ratio was also compared to that of area credit unions. As of December 31, 2000, Aldenville Credit Union had total assets of \$75,777,000 and a net loan to deposit (share) ratio of 67.4 percent. The net loan to deposit ratios of area credit unions is reflected in the following table. Those institutions chosen for this analysis have a main office or branch location in Aldenville Credit Union's assessment area. The data presented is as of December 31, 2000.

COMPARATIVE NET LOAN TO TOTAL DEPOSIT (SHARE) RATIOS*		
Institution	Total Assets \$(000)	Net Loan to Total Share Deposit Ratios (%)
Aldenville Credit Union	75,777	67.4
Chicopee Municipal Credit Union	33,185	25.5
Holyoke Credit Union	47,660	76.4
Polish National Credit Union	246,828	52.0
Springfield Massachusetts Municipal Employees Credit Union	43,173	72.3
Springfield Teachers Credit Union	76,861	57.8
Western Massachusetts Telephone Workers Credit Union	196,898	75.7

*As of December 31,2000

Based on the aforementioned analysis, Aldenville Credit Union has achieved a reasonable loan to deposit level given its capacity to lend and the credit needs of its assessment area.

2. COMPARISON OF CREDIT EXTENDED INSIDE AND OUTSIDE OF THE ASSESSMENT AREA (S)

HMDA Reportable Lending

Based upon the following data, Aldenville Credit Union's percentage of credit extended within its assessment area is considered to be significant and is determined to exceed the standard for satisfactory performance under this criterion.

An analysis of Home Mortgage Disclosure Act (HMDA) reportable loans extended both inside and outside Aldenville Credit Union's assessment area was performed. The period reviewed for HMDA reportable lending constitutes calendar years 1999 and 2000, as well as the interim period through June 19, 2001. A HMDA- reportable loan is defined as a home purchase loan (including originations, purchases, and refinances) as well as a home improvement loan.

The following table illustrates Aldenville Credit Union's level of HMDA- reportable lending both inside and outside its assessment area.

<i>Distribution of Home Mortgage Loans Inside and Outside of the Assessment Area</i>												
Year	<i>Inside</i>				<i>Outside</i>				<i>Total</i>			
	<i>Number of Loans</i>		<i>Dollar Volume (000)</i>		<i>Number of Loans</i>		<i>Dollar Volume (000)</i>		<i>Number of Loans</i>		<i>Dollar Volume (000)</i>	
	#	%	\$	%	#	%	\$	%	#	%	\$	%
1999	133	99.3	8,959	99.1	1	0.7	77	0.9	134	100	9,036	100
2000	71	100.0	3,526	100.	0	0.0	0	0.0	71	100	3,526	100
2001 *	36	100	1,749	100	0	0.0	0	0.0	36	100	1,749	100

Source: HMDA LAR, CRA Wiz

*Through June 19, 2001.

The above table indicates that of the HMDA-reportable loans originated by the credit union, 99.3 percent in 1999 and 100 percent in 2000 and 2001 were made within the assessment area. The dollar amount of loans followed the same pattern.

The majority of the number of loans (53.1 percent) was granted in the City of Chicopee, where the credit union maintains its main office and a branch office location. The second largest number of loans overall, (10.0 percent) was granted in the City of Springfield, and the third largest number (7.5 percent) was granted in the Town of South Hadley.

As discussed in the Performance Context of this Public Evaluation, Aldenville Credit Union achieved a ranking of 36th in market share (out of 361 lenders) for its HMDA reportable lending in 1999. However, given the size and the resources available to Aldenville Credit Union, the level of HMDA reportable lending within its assessment area is considered significant.

Consumer Lending

An analysis of a sample of consumer loans extended inside and outside Aldenville Credit Union's assessment area for the period under review was performed. The types of consumer loans used in the sample were personal, automobile, and recreational loans.

The following table illustrates Aldenville Credit Union's level of consumer lending both inside and outside its assessment area based upon the sample.

<i>Distribution of Consumer Lending Inside and Outside of the Assessment Area</i>												
Year	<i>Inside</i>				<i>Outside</i>				<i>Total</i>			
	<i>Number of Loans</i>		<i>Dollar Volume (000)</i>		<i>Number of Loans</i>		<i>Dollar Volume (000)</i>		<i>Number of Loans</i>		<i>Dollar Volume (000)</i>	
	#	%	\$	%	#	%	\$	%	#	%	\$	%
1999	45	93.8	268	93.1	3	6.2	20	6.9	48	100	288	100
2000	45	93.8	318	95.2	3	6.2	16	4.8	48	100	334	100
2001*	43	93.5	267	91.7	3	6.5	24	8.3	46	100	291	100

Source: Internally generated reports.

*Through May 31, 2001.

As indicated above, out of a total sample of 142 consumer loans the credit union originated 133 loans or 93.7 percent inside its assessment area. By dollar volume, the credit union originated \$853,000 or 93.4 percent inside its assessment area.

Based upon the sample taken, Aldenville Credit Union's consumer lending performance within its assessment area is considered strong.

3. LENDING TO BORROWERS OF DIFFERENT INCOMES

Based upon the following analysis, Aldenville Credit Union's distribution of HMDA reportable loans and consumer loans to borrowers of different incomes is considered to be very strong. Therefore, the credit union is determined to exceed the standards for satisfactory performance under this criterion.

HMDA Reportable Lending

An analysis of HMDA reportable loans extended within Aldenville Credit Union's assessment area, among borrowers of various income levels was performed. Originations were categorized by the ratio of the applicant's reported income to the 1999, 2000, and 2001 estimated median family incomes of the appropriate Metropolitan Statistical Area (MSA). Refer to the Performance Context Section for information regarding the MSAs.

Low income is defined by the US Census Bureau as income below 50 percent of the median family income level for the MSA. Moderate income is defined as income between 50 to 79 percent of the median family income level for the MSA. Middle income is defined as income between 80 and 119 percent of the median family income level. Upper income is defined as income greater than 120 percent of the median family income level.

The following analysis also includes 1999 HMDA aggregate loan data (exclusive of Aldenville Credit Union) as well as demographic data on the percentage of total households in the assessment area in each respective income group.

Distribution of HMDA Loans by Borrower Income								
Median Family Income Level	% Total Household	%Aggregate Lending Data 1999	1999		2000		2001*	
			#	%	#	%	#	%
Low	25.1	4.6	14	10.5	12	16.9	5	13.9
Moderate	14.8	17.2	30	22.5	15	21.1	12	33.3
Middle	19.5	25.2	34	25.6	21	29.6	11	30.6
Upper	40.6	38.6	55	41.4	23	32.4	8	22.2
NA	0.0	14.4	0	0.0	0	0.0	0	0.0
Total	100	100	133	100	71	100	36	100

Source: U.S. Census, HMDA LAR, and HMDA Aggregate Data

*Through June 19, 2001.

Included in the low-income category are 26,518 family households within the credit union's assessment area whose income is considered to be below poverty level, and thus, unlikely to qualify for a mortgage loan. If that category were adjusted to reflect this fact, the number of low-income family households within the credit union's assessment area would be decreased from 55,583 to 29,065 or 14.9 percent.

It should be noted that those originations designated as not applicable are loans where the borrowers' income was not taken into account when granting the loan; the borrower is an employee; or the loan was purchased.

In total, the credit union granted 12.9 percent of its HMDA reportable loans to low-income borrowers and 23.8 percent to moderate-income borrowers.

As indicated in the table, the credit union's percentage of the number of loans to low-income borrowers also surpassed that of the aggregate in 1999. The credit union made 10.5 percent of its HMDA loans to low-income borrowers, versus 4.6 percent for the aggregate. Similarly, the credit union made 22.5 percent of its loans to moderate-income borrowers versus 17.2 percent by the aggregate. The credit union's 2000 and interim 2001 performance, by percentage, remained consistent or improved upon its 1999 performance.

By dollar volume, Aldenville Credit Union originated 6.1 percent of its HMDA reportable lending to low-income borrowers and 16.7 percent to moderate-income borrowers in 1999. This compared favorably to 1999 aggregate lending which was 2.4 percent and 12.3 percent for low and moderate-income borrowers, respectively.

Given the above, Aldenville Credit Union's level of lending to borrowers of low and moderate-income is considered significant.

Consumer Lending

An analysis of Aldenville Credit Union's consumer lending by borrower income was also performed. As noted previously, this analysis was based upon a sample of consumer loans, including personal automobile and recreation loans. A total of 133 loans originated during the time period were reviewed.

Please refer to the following table.

<i>Distribution of Consumer Lending by Borrower Income</i>						
<i>Median Family Income Level</i>	<i>1999</i>		<i>2000</i>		<i>2001*</i>	
	#	%	#	%	#	%
<i>Low</i>	14	31.1	15	33.3	17	39.5
<i>Moderate</i>	18	40.0	14	31.1	11	25.6
<i>Middle</i>	7	15.6	10	22.2	4	9.3
<i>Upper</i>	6	13.3	6	13.4	11	25.6
<i>Total</i>	45	100	45	100	43	100

Source: Internally generated reports.

*Through May 31, 2001.

In total, the credit union granted 34.6 percent of the sample to low-income borrowers and 32.3 percent to moderate-income borrowers.

By dollar volume, Aldenville Credit Union granted 16.1 percent of the sample to low-income borrowers and 39.9 percent to moderate-income borrowers in 1999. In 2000, 16.7 percent and 32.7 percent of the sample, respectively was distributed to low and moderate-income borrowers. In 2001 16.1 percent of consumer loans were made to low-income borrowers and 21.0 percent were made to moderate-income borrowers.

The combined total of the number of consumer loans granted to low and moderate-income borrowers was 89 loans or 66.9 percent of the 133 total consumer loans in the sample.

It is recognized that consumer loans are generally granted to single applicants. Therefore, the percentage of originations occurring in low and moderate-income levels can be somewhat higher than that of residential mortgage originations, where the income typically is the result of joint borrower incomes. However, Aldenville Credit Union's penetration of its consumer lending to borrowers of low and moderate-income is considered to be significant.

4. GEOGRAPHIC DISTRIBUTION OF LENDING

The following analysis indicates that Aldenville Credit Union has achieved a reasonable dispersion of its HMDA-reportable lending and consumer lending within the low and moderate-income census tracts located in its assessment area. Therefore, the credit union was found to meet the standards for satisfactory performance in this criterion.

HMDA Reportable Lending

An analysis of HMDA-reportable lending extended in census tracts of different income levels within Aldenville Credit Union's assessment area was conducted. As mentioned previously, Aldenville Credit Union's assessment area contains 123 census tracts. Of those tracts, 10.6 percent are low-income, 11.4 percent are moderate-income, 53.7 percent are middle-income, 19.5 percent are upper-income, and 4.8 percent have no income designation.

The following table presents the credit union's performance, as well as the 1999 aggregate data by percentage. In addition, the table also reflects demographic data on the percentage of owner-occupied housing units (per 1990 census data) in each of the census tract income categories.

<i>Distribution of HMDA Loans by Income Category of the Census Tract</i>								
Census Tract Income Level	Owner-Occupied Housing Units %	1999% Aggregate Lending Data %	1999		2000		2001*	
			#	%	#	%	#	%
Low	1.6	2.2	0	0.0	0	0.0	1	2.8
Moderate	6.0	6.6	4	3.0	3	4.2	3	8.3
Middle	66.9	64.5	97	72.9	63	88.7	25	69.4
Upper	25.5	26.4	32	24.1	5	7.1	7	19.5
NA	0.0	0.3	0	0.0	0	0.0	0	0.0
Total	100	100	133	100	71	100	36	100

Source: U.S. Census, HMDA LAR, and HMDA Aggregate Data

*Through June 19, 2001.

In total, the credit union granted 0.4 percent of its HMDA reportable loans in the low-income tracts and 4.2 percent in the moderate-income tracts.

Although the credit union originated only one HMDA reportable loan within the one low-income census tracts for the period reviewed, the aggregate also had a nominal penetration of those tracts, and the demographic data reflects virtually non-existent

availability of owner-occupied units within those tracts. Furthermore, although the credit union's percentage of lending in the moderate-income census tracts is below that of the aggregate in 1999, the credit union's 2000 and interim 2001 percentages reflect an improving trend in those census tracts.

By dollar volume in 1999, Aldenville Credit Union originated 1.8 percent of its HMDA reportable lending in the moderate-income census tracts, well below 1999 aggregate lending which was 5.2 percent in those census tracts.

Based upon the above analysis, Aldenville Credit Union's level of HMDA- reportable loans within the low and moderate-income census tracts within its assessment area is considered reasonable.

Consumer Lending

An analysis of Aldenville Credit Union's consumer lending by census tract was also performed. Refer to the following.

<i>Distribution of Consumer Lending by Income Category of the Census Tract</i>						
<i>Census Tract Income Level</i>	<i>1999</i>		<i>2000</i>		<i>2001*</i>	
	<i>#</i>	<i>%</i>	<i>#</i>	<i>%</i>	<i>#</i>	<i>%</i>
<i>Low</i>	2	4.4	3	6.7	2	4.7
<i>Moderate</i>	4	8.9	2	4.4	4	9.3
<i>Middle</i>	34	75.6	28	62.2	36	83.7
<i>Upper</i>	3	6.7	12	26.7	1	2.3
<i>NA</i>	2	4.4	0	0.0	0	0.0
<i>Total</i>	45	100	45	100	43	100

Source: Internally generated reports

*Through May 31, 2001.

In total, the credit union granted 5.3 percent of the sample of loans within low-income census tracts and 7.5 percent within moderate-income census tracts in the credit union's assessment area.

By dollar volume, Aldenville Credit Union made 0.7 percent of the sample in the low-income census tracts and 3.0 percent in moderate-income census tracts in 1999. In 2000, the sample reflected 4.1 percent and 6.3 percent of loans in the low and moderate-income census tracts, respectively. The interim 2001 sample indicated 4.1 percent of loans in the low-income and 7.9 percent in the moderate-income census tracts.

In conclusion, Aldenville Credit Union's lending penetration of the low and moderate-income census tracts within its assessment area is considered to be reasonable.

5. REVIEW OF COMPLAINTS/FAIR LENDING POLICIES AND PRACTICES

Review of Complaints

Aldenville Credit Union has received no complaints regarding its CRA performance for the period under review.

Fair Lending Policies and Practices

Aldenville Credit Union provides training in fair lending policies and practices through an outside consulting firm contracted by the credit union. This training is performed, at a minimum, annually. The credit union employs 32 employees some of whom are bi-lingual in French, Polish, and Spanish. Minority employees include Hispanics and African Americans. The credit union continues to market its products regularly in local print media that includes several free publications, as well as local radio stations, the use of billboards, and occasionally on cable television. The credit union currently refers members who need credit assistance to the Springfield Office of Consumer Credit Counseling Services of Massachusetts (CCCS). To ensure consistency in underwriting practices, Aldenville Credit Union's Fair Lending Policy incorporates a Second Review Policy. In addition, a second review procedure for each type of credit product is included in the Lending Procedures Policy.

In 1999 and 2000, Aldenville Credit Union hired personnel whose primary focus is the oversight and development of fair lending practices within the institution. They have further supported this activity through contracting with a private consulting firm that specializes in compliance issues.

Minority Application Flow

The Division reviewed the number of HMDA reportable loan applications received by the credit union from within its assessment area. For the period reviewed Aldenville Credit Union received 10 minority applications or 3.7 percent of the 268 applications received.

As of the 1990 census, the credit union's assessment area's racial composition was White, 84.7 percent; Native American, 0.2 percent; Asian, 1.3 percent; Black, 5.8 percent; Hispanic, 7.9 percent; and Other, 0.1 percent.

As of the 1990 census, the population by racial composition for the City of Chicopee only (where the credit union's main office, branch office, and lending center are located) was White, 93.9 percent; Native American, 0.1 percent; Asian, 0.5 percent; Black, 1.9 percent; Hispanic, 3.6 percent; and Other, 0.0 percent.

The credit union's minority application flow was compared to that of the aggregate lenders for calendar year 1999. The following table presents this distribution:

MINORITY APPLICATION FLOW*								
RACE	AGGREGATE DATA 1999		Credit Union 1999 Performance		Credit Union 2000 Performance		Credit Union 2001* Performance	
	#	%	#	%	#	%	#	%
<i>Native American</i>	66	0.2	0	0.0	0	0.0	0	0.0
<i>Asian</i>	223	0.7	0	0.0	0	0.0	0	0.0
<i>Black</i>	1,292	4.2	1	0.7	1	1.2	0	0.0
<i>Hispanic</i>	1,398	4.5	1	0.7	3	3.4	0	0.0
<i>Joint Race</i>	317	1.0	2	1.4	1	1.2	1	2.6
<i>Other</i>	212	0.7	0	0.0	0	0.0	0	0.0
Total Minority	3,508	11.3	4	2.8	5	5.8	1	2.6
<i>White</i>	18,988	61.0	137	95.8	81	94.2	38	97.4
<i>NA</i>	8,619	27.7	2	1.4	0	0.0	0	0.0
Total	31,115	100	143	100	86	100	39	100

*Source: PCI Services, Inc., CRA Wiz Software.

*Through June 19, 2001.

According to the above table, Aldenville Credit Union's minority application flow of 2.8 percent in 1999 was well below that of the Aggregate, at 11.3 percent. It should be pointed out, however, that the aggregate also displays a very large number of N/A, which may affect the overall percentage distribution.

In addition, the credit union's consumer lending for the months of November and December 2000 was reviewed using an internally generated report that indicated the borrowers surname. For the period reviewed, the credit union received 356 consumer loan applications. Of those applications, 16 or 4.5 percent of the applicants were determined to be of Hispanic origin.

Based upon the above data, Aldenville Credit Union's fair lending policies and practices meet the standards for satisfactory performance.

THE COMMONWEALTH OF MASSACHUSETTS

To the COMMISSIONER OF BANKS:

THIS IS TO CERTIFY, that the report of examination of the

ALDENVILLE CREDIT UNION

for compliance with applicable consumer and fair lending rules and regulations and the Community Reinvestment Act (CRA), as of the close of business **JUNE 19, 2001**, has been read to or by the undersigned and the matters referred to therein will have our immediate attention.

_____	_____
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_____	_____
_____	_____

A majority of the Board of Directors/Trustees

Dated at _____ this _____ day of _____ 20 _____

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, and the Uniform Interagency Community Reinvestment Act (CRA) Guidelines for Disclosure of Written Evaluations require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (Address at main office)."

[Please Note: If the institution has more than one assessment area , each office (other than off-premises electronic deposit facilities) in that assessment area shall also include the address of the designated office for that assessment area.]

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agency, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.